

EXHIBIT 68-21



**Dimitrov vs
Stavatti Aerospace**

John Simon

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Valentino Dimitrov, individually)	
and on behalf of all others)	
similarly situated,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	2:23-CV-00226-PHX-DJH
Stavatti Aerospace, Ltd, a)	
Minnesota corporation, et al.,)	
)	
Defendants.)	
_____)	

VIDEOCONFERENCE DEPOSITION OF JOHN SIMON

Phoenix, Arizona
January 21, 2025
9:18 a.m.

REPORTED BY:
TERESA A. WATSON, RMR
Certified Reporter
Certificate No. 50876

PREPARED FOR:
ASCII/Condensed

(Certified Copy)



Griffin Group International
888.529.9990 | 602.264.2230

1 could be American allies or NATO members.

2 BY MR. CHEBAT:

3 Q. Is there a designated design and engineering team at
4 Stavatti?

5 A. Sorry?

6 Q. Is there a designated design and engineering team at
7 Stavatti?

8 A. Well, that's primarily Chris Beskar.

9 Q. Chris Beskar provides all design and engineering
10 services to the organization?

11 A. Thus far that is my understanding.

12 Q. Are you aware of any other third parties that he may
13 work with for design and engineering?

14 A. No.

15 Q. Has Stavatti produced any revenue through presales of
16 any commercially marketable aerospace or aviation product?

17 A. I believe that we did receive a check for a couple
18 thousand dollars for one of our sport aircraft. As a deposit.

19 Q. And who provided that check?

20 A. Goodness, I don't know. I'm sorry. That was years
21 ago.

22 Q. How much was that check for?

23 A. Several thousand dollars. Couple thousand dollars.

24 Q. What value is a couple?

25 A. Again, I don't remember.



1 Q. And was that aircraft ever built?

2 A. Not yet.

3 Q. And has Stavatti built any aircraft to date?

4 A. I don't know that. Not during my tenure.

5 Q. Are you aware of a Vice article that refers to
6 Stavatti as a company that's never made a plane?

7 A. I've read articles on the internet. It may have been
8 one of them.

9 Q. What's your understanding of Stavatti's current
10 financial situation?

11 A. We intend -- we have debt, and we intend to pay that
12 debt. It's my understanding we intend to also make good any
13 type of investment that was made, or loan in the case of what I
14 understand Mr. Dimitrov has with Stavatti, to pay that back.

15 Q. And who are the debt holders of Stavatti?

16 A. I know Mr. Dimitrov is. I don't know anybody else. I
17 don't have a list of the debtors to Stavatti. I don't keep
18 track of that money, that monetary information.

19 Q. Earlier you mentioned that David Kim, Dr. Kim, had a
20 lien on the property. What was that for?

21 A. Yes. He made a loan, as you said, for a certain
22 amount of money.

23 Q. So is he a debt holder of the Stavatti organization?

24 A. I believe so. Yes.

25 Q. And is there any other individuals who are debt



1 Q. And is current intent for those prototypes to be built
2 in -- is the current intent for the prototypes to be built in
3 western New York?

4 A. Most likely, yes. And I say most likely, yes, because
5 it depends what -- the size and the actual prototype itself.
6 Some prototypes can be built in a smaller facility. And we
7 don't have a smaller facility, but they could be built in a
8 smaller facility or a large one needs our site.

9 Q. But to date, to your knowledge, since the company's
10 founding, it has not created a prototype?

11 A. Since I've been involved, yes.

12 Q. There was early mention of a possible acquisition with
13 the Ukrainian government for \$192 million. What came of that
14 initiative?

15 A. I don't know.

16 Q. Were you aware of that purchase contract?

17 A. Yes. And the possibility of it happening. It never
18 happened.

19 Q. Are you aware of any large purchase agreement for any
20 aircraft from Stavatti from a third party?

21 A. We've had mention at those general meetings, a variety
22 of different opportunities.

23 Q. Have any of those opportunities ever manifested?

24 A. Not yet.

25 Q. And when do you expect the first of these



